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6 CLERK U.S. DISTRICT COURT
7 WESTERN DISTRICT OF WASHINGTON
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10 UNITED STATES DISTRICT COURT FOR THE
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

13 UNITED STATES OF AMERICA,

14 NO. CR 16-213 RSL

15 Plaintiff,

16 FELONY INFORMATION

17 v.

18 JAMES JOSEPH CONLIN,

19 Defendant.

20 The United States Attorney charges that:

21 **COUNT 1**
22 *(Wire Fraud)*

23 A. **The Scheme and Artifice to Defraud.**

24 1. Beginning at a date uncertain, but no later than May 2008, and continuing
25 until on or about April 2013, in King County, within the Western District of Washington,
26 and elsewhere, JAMES JOSEPH CONLIN devised a scheme and artifice to defraud, and
27 to obtain money and property by means of materially false and fraudulent pretenses,
28 representations, and promises, and the concealment of material facts.

29 2. The object of the scheme and artifice to defraud was for JAMES JOSEPH
30 CONLIN unlawfully to obtain money and funds, in the form of real estate proceeds, from
31 R.M. by unilaterally facilitating and orchestrating the unauthorized sale of real property

1 belonging to R.M., without R.M.'s knowledge or consent, for the sole purpose of using
2 said proceeds for his own personal and business expenses. In so doing, JAMES JOSEPH
3 CONLIN misrepresented to buyers that he was acting on the victim's behalf.

4 **B. Manner and Means of the Scheme to Defraud.**

5 3. It was a part of the scheme and artifice that JAMES JOSEPH CONLIN
6 obtained power of attorney from R.M.

7 4. It was further part of the scheme and artifice to defraud that JAMES
8 JOSPEH CONLIN concealed from R.M. the fact that he had been disbarred in 2010 from
9 practicing law in the State of Washington.

10 5. It was further part of the scheme and artifice to defraud that JAMES
11 JOSEPH CONLIN executed the sale of two properties, one on August 3, 2009 and the
12 other on December 15, 2011, for total value of approximately \$379,500, and used the sale
13 proceeds, totaling approximately \$70,000.00, for personal expenses.

14 6. It was further part of the scheme and artifice to defraud that on or about
15 November 18, 2011, JAMES JOSEPH CONLIN forged the signature on a Quit Claim
16 Deed for the property located at 3216 South 208th Street, SeaTac, Washington.

17 7. It was further part of the scheme and artifice to defraud that on or about
18 November 18, 2011, JAMES JOSEPH CONLIN forged the notary seal on the Quit Claim
19 Deed for the property located at 3216 S 208th Street, SeaTac, Washington.

20 8. It was further part of the scheme and artifice to defraud that in or around
21 April 2013, JAMES JOSEPH CONLIN forged the signatures and notary on Special
22 Warranty Deed and the signature on Statutory Warranty Deed for the property located at
23 846 South Donovan Street, Seattle, Washington.

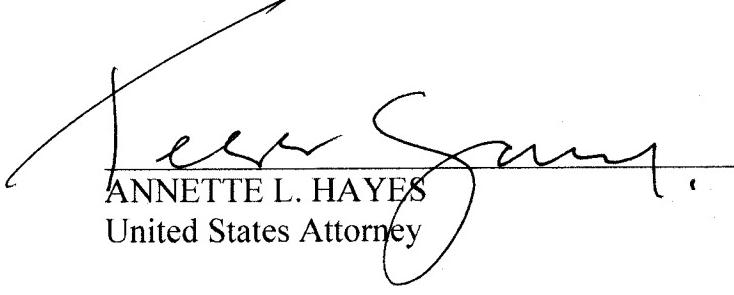
24 **C. Execution of the Scheme and Artifice to Defraud**

25 9. On or about the below listed date, in King County, within the Western
26 District of Washington, and elsewhere, JAMES JOSEPH CONLIN, having devised the
27 above-described scheme and artifice, and for the purpose of executing this scheme and
28 artifice, did knowingly transmit and cause to be transmitted, in interstate commerce by

1 means of a wire communication, certain writings, signs, signals, pictures, and sounds, to
2 wit:

Count	Date	Interstate Wire & Content
1	December 20, 2011	Electronic wire containing instructions to transfer \$44,012.59 in proceeds from the unauthorized sale of R.M.'s property to Defendant's bank account, from Pinnacle Escrow located in Bellevue, Washington, to Banner Bank, after which the wire was routed through Fedwire servers located in Dallas, Texas and East Rutherford, New Jersey.

9
10 All in violation of Title 18, United States Code, Sections 1343.
11 Dated this 16 day of July, 2016.

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15 ANNETTE L. HAYES
United States Attorney
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20 MIKE DION
Assistant United States Attorney
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24 C. ANDREW COLASURDO
Assistant United States Attorney
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